

YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT

1947 Galileo Court, Suite 103; Davis, CA 95618

Phone (530) 757-3650 Fax (530) 757-3670

FACILITY NUMBER: 00260

SIC CODE: 3792

AUTHORITY TO CONSTRUCT

C-09-144

IS HEREBY GRANTED TO

TRUCK ACCESSORIES GROUP, LLC

dba LEER WEST

1686 East Beamer Street

Woodland, CA 95776

EQUIPMENT LOCATION: 1686 East Beamer Street; Woodland, CA

TO CONSTRUCT

PROCESS DESCRIPTION: Coating Operation: Automotive; Modification of P-23-93(a1) to amend the process description to include the painting of metal.

EQUIPMENT INVENTORY: 8' x 25' x 116' paint spray booth with HVLP gun(s), enclosed gun washer, one (1) 2 MMBtu/hr natural gas fired heater, and one (1) 1 MMBtu/hr natural gas fired heater

- Total Billing: Schedule 8, Miscellaneous -

CONTROL EQUIPMENT INVENTORY:

Four (4) 10,500 cfm each exhaust fans with dry filter system; munters rotor concentrator catalytic oxidizer (RCCO), Model No. IZS-3546-CT, serving the paint booth and shared with P-108-91(a1). RCCO has one (1) 0.2 MMBtu/hr natural gas fired burner on the concentrator and one (1) 1.2 MMBtu/hr natural gas fired burner on the oxidizer; dry filter system integral to RCCO

PERMITTED EMISSION LIMITS:

Pollutant	Daily [lb]	Qtr #1 (Jan 1-Mar 31) [lb]	Qtr #2 (Apr 1-June 30) [lb]	Qtr #3 (July 1-Sept 30) [lb]	Qtr #4 (Oct 1-Dec 31) [lb]	Yearly [tons]
VOC	112.2	6,903	6,979	7,056	7,056	10.00

CO	8.9	798	807	816	816	1.62
NO _x	10.6	950	961	972	972	1.93
SO _x	0.1	6	6	6	6	0.01
PM ₁₀	6.2	403	409	415	415	0.82

PERMITTED PROCESS LIMITS:

		Qtr #1	Qtr #2	Qtr #3	Qtr #4	
	Daily	(Jan 1-Mar 31)	(Apr 1-June 30)	(July 1-Sept 30)	(Oct 1-Dec 31)	Yearly
Natural Gas (million scf)	0.11	9.50	9.61	9.72	9.72	38.54
VOC from coating processes (lbs)	112	6,885	6,961	7,038	7,038	19,923

The following information is included to inform and assist the Permit Holder in achieving compliance with applicable provisions of Federal, State, and District Rules and Regulations. The following set of referenced regulations are not intended to be either comprehensive or exclusive, nor are they intended to be emission limiting permit conditions, but they are still applicable rules of the District. Occasionally laws are amended. The amended versions of the referenced rules shall be deemed to be in effect. **It is the Permit Holder's responsibility to comply with all applicable Rules and Regulations.**

1. After construction of all listed process and control equipment is complete, as determined by the District, the ATC Holder shall have 45 calendar days to conduct tests and perform other necessary initial adjustments on the equipment. During this time, this Authority to Construct and its conditions shall function as a temporary Permit to Operate. Any operation of the equipment beyond this period without either District receipt of a valid Permit to Operate Notification Card or written extension from the District, will be considered operation without a permit and subject to enforcement action. The ATC Holder shall provide the District, in writing, a notice prior to commencing the 45-day start-up period. [District Rule 3.1, §402]
2. The District requires an inspection of the equipment after completion of the construction and prior to the issuance of the Permit to Operate. [District Rule 3.1, §402]
3. An authorization to construct shall remain in effect only until the application for Permit to Operate is granted or denied; however, such an authorization shall not remain in effect beyond two years from the date of issuance unless the District finds that the time required for construction requires an extension and grants one or more extensions, for a total time not to exceed five years from the date of issuance. [District Rule 3.1, §407]

The following set of conditions are established by the District to provide enforceable operating parameters as authorized by California Health and Safety Code Section 42301 and District Rule 3.1, Section 402. If any of the rules and regulations referenced below are amended subsequent to the issuance date of this permit, resulting in the amended rule differing from or superseding the corresponding condition, then the Permit Holder shall be required to comply with the amended rule or regulation and shall no longer be required to comply with the superseded condition.

4. For the coating processes and related activities operating under C-09-143 and C-09-144, total coating related VOC emissions for both booths shall not exceed 112 lb/day, 6,885 lb/1st calendar quarter, 6,961 lb/2nd calendar quarter, 7,038 lb/3rd calendar quarter, 7,038 lb/4th calendar quarter, and 9.96 tons/year. [District Rule 3.4]
5. For the processes operating under C-09-143 and C-09-144, the maximum amount of natural gas fuel consumed for all burners shall not exceed 0.13 million cubic feet/day, 11.66 million cubic feet/1st calendar quarter, 11.79 million cubic feet/2nd calendar quarter, 11.92 million cubic feet/3rd calendar quarter, 11.92 million cubic feet/4th calendar quarter, 47.30 million cubic feet/year. [District Rule 3.4]
6. A non-resettable, totalizing gaseous fuel flow meter shall be utilized to measure the quantity (in cubic feet) of natural gas combusted. [District Rule 3.4]
7. For the coating processes and related activities operating under C-09-143 and C-09-144, when determining compliance with the daily, quarterly, and yearly permitted process VOC limit, the source shall use the following equation [District Rule 3.4]:

$$\sum((OB \times OB_{voc}) + (IB \times IB_{voc} \times (1-CE/100))) = \text{VOC from coating processes (lbs)}$$

where:

OB = amount of solvent (or other material) used outside booths (gallons)
OB_{voc} = VOC content of (OB) material used (lb/gallon)
CE = control efficiency of RCCO = 95%
IB = amount of paint (or other material) used inside booth (gallons)
IB_{voc} = VOC content of (IB) material used (lb/gallon)

8. The Permit Holder shall not discharge into the atmosphere any air contaminant, for a period or periods aggregating to more than 3 minutes in any one hour which is:
 - a. As dark or darker in shade than No. 2 on the Ringelmann Chart; or
 - b. Greater than 40% opacity. [District Rule 2.3]
9. The Permit Holder shall not discharge into the atmosphere, from the control equipment exhaust, any air contaminant, for a period or periods aggregating to more than 3 minutes in any one hour which is:
 - a. As dark or darker in shade than No. 1/4 on the Ringelmann Chart; or
 - b. Greater than 5% opacity. [District Rule 3.4]

10. The Permit Holder shall not apply any coating to any motor vehicle, mobile equipment or their parts and components unless electrostatic or high volume low pressure (HVLP) application equipment is used. [District Rule 2.26, §304]
11. The maximum VOC content of solvents used for surface preparation and cleanup, including product cleaning, repair and maintenance cleaning and the cleaning of application equipment, without the use of the RCCO, shall not exceed 50 g/l (0.42 lb/gallon). [District Rule 2.31, §301 and §307]
12. The Permit Holder shall store all VOC-containing materials used in the coating operation (including coatings, catalysts, thinners, reducers and solvents), in non-absorbent, non-leaking containers. The containers are to be kept closed at all times except when filling or emptying. [District Rule 3.4]
13. The Permit Holder shall use closed containers for the disposal of cloth, paper, or other VOC laden materials (including solvent and spent solvent used for surface preparation, clean-up, and paint removal). [District Rule 3.4]
14. The Permit Holder shall not use organic compounds, with a VOC content greater than 25 g/l, for the cleanup of spray equipment, without the use of the RCCO, unless the spray equipment is disassembled and cleaned in an enclosed gun washer or other low emission washing system that has been demonstrated to be at least equivalent to an enclosed system. [District Rule 2.31, §306 and §307]
15. The rotor concentrator desorption air shall be maintained at a minimum temperature of 300° F, or as determined by the initial source test. [District Rule 3.4]
16. The catalytic oxidizer shall operate at a minimum temperature of 550° F, or as determined by the initial source test. [District Rule 3.4]
17. The pressure differential of the paint booths shall be maintained at a minimum of 0.008 inches water column while the paint booth is in operation. [District Rule 3.4]
18. All painting shall be conducted in the booth with the RCCO operating. The RCCO shall remain fully interlocked with the spray gun air supply to prevent painting without the RCCO operating. [District Rule 3.4]
19. The RCCO shall destroy a minimum of 95% of VOC emissions from the paint booth. [District Rule 3.4]
20. The Permit Holder shall utilize booth exhaust particulate filters that are at least 95% efficient, as documented by the filter certification sheet. [District Rule 3.4]
21. The Permit Holder shall perform a source test at least once every consecutive 24 months to demonstrate compliance with VOC control efficiency requirements. [District Rule 3.4]

22. Ongoing source testing shall be conducted using the following test methods [District Rule 3.4]:
 - e. Flow Rate - EPA Methods 1 & 2;
 - b. Stack gas oxygen - EPA Method 3A, or CARB Method 100;
 - c. VOC - EPA Method 25 (inlet prior to adsorber and outlet at stack);
23. The District must be notified prior to any source test and a protocol must be submitted for approval at least 14 days prior to testing. The results of the source test shall be submitted to the District within 60 days of the test date. The protocol and report shall be mailed to the attention of the Supervising Air Quality Engineer. [District Rule 3.1, §402]
24. The paint booths shall be equipped with manometric gauges. These gauges shall be read at least once per operating day, while the booth is operating, and shall be recorded in a log. [District Rule 3.1, §402]
25. The Permit Holder shall continuously monitor and record both the temperature of the desorption air stream and the temperature of the catalytic oxidizer. [District Rule 3.4]
26. The paint booths must be maintained as Permanent Total Enclosures (PTE), as specified in EPA method 204. The natural draft opening sizes and locations shall be verified and documented during the start up period and shall be verified at least once every 12 calendar months. [District Rule 3.4]
27. The Permit Holder shall maintain a daily log of coating use for P-108-91(a3) and P-23-93(a2) combined. This log shall include coating category, coating name, amount of each coating used, and VOC contents as applied for each coating. [District Rule 2.26, §501]
28. The Permit Holder shall maintain daily records of critical faults and shutdowns of the RCCO. These records shall contain the date, the time of the critical fault or shutdown, the duration, and the reason for the fault or shutdown. [District Rule 3.1, §402]
29. The Permit Holder shall maintain daily records showing the type, name, and amount of solvent used for cleanup and surface preparation. [District Rule 3.1, §402]
30. All required records shall be retained for a minimum of five years and shall be made available for District inspection upon request. [District Rule 3.1, §402]
31. The Permit Holder shall comply with the National Emissions Standard for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. [40CFR63 Subpart M]]
32. The Permit Holder shall comply with the National Emissions Standard for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products. [40CFR63 Subpart P]]

This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26, Part 4, Chapter 3, of the Health & Safety Codes of the State of California or the Rules and Regulations of the Yolo-Solano Air Quality Management District.

Mat Ehrhardt, P.E.
AIR POLLUTION CONTROL OFFICER

By: _____

Date of Issuance: _____